

EXHIBIT J

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BABCOCK BORSIG POWER GmbH,
Plaintiff,

v.

BABCOCK POWER, INC.,
Defendant and Third-Party Plaintiff,

v.

BABCOCK BORSIG, AG
Third-Party Defendant.

C.A. No. 04 CV 10825-RWZ

NOTICE OF DEPOSITION

To: Steven J. Comen, Esq.
Goodwin Procter LLP
Exchange Place
Boston, MA 02109

Please take notice that beginning at 1:00 p.m. on January 26, 2006, at the offices of Lex Reporting Services Corporate Headquarters, 160 Broadway, New York, NY 10038, the Plaintiff Babcock Borsig Power GmbH will take the deposition of the Keeper of the Records, Hevrony IC LLC, and that he/she is required to produce the documents set forth in the attachment hereto.

The deposition will be conducted before a Notary Public or other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

Respectfully submitted,

BABCOCK BORSIG POWER GMBH,

By Its Attorneys,

Kenneth M. Bello, BBO #036630
John F. Welsh, BBO #522640
Bello Black & Welsh LLP
535 Boylston Street, Suite 1102
Boston, Massachusetts 02116
(617) 247-4100

Dated: December 30, 2005

SUBPOENA: KEEPER OF THE RECORDS, HEVRONY IC LLC.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects:

1. Any and all communications from September 2002 through the Present relating to the November 13, 2002 Stock Purchase Agreement ("SPA") between Babcock Borsig Power, GmbH ("BBP") and Babcock Power Inc. ("BPI").
2. Any and all communications from September 2002 through the Present relating to the November 29, 2002 Non-Competition Agreement ("NCA") between BBP and BPI.
3. Any and all documents concerning the SPA, including, but not limited to drafts, notes, memos, and correspondence.
4. Any and all documents concerning the NCA, including, but not limited to drafts, notes, memos, and correspondence.
5. Any and all documents concerning the purchase by Babcock Hitachi K.K. or Hitachi Ltd. (collectively, "Hitachi") of Babcock Borsig AG's ("BBX") subsidiary Power Systems in December 2002, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
6. Any and all documents concerning communications between BPI and Hitachi concerning Hitachi's purchase of Power Systems, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
7. Any and all documents concerning monies pledged or paid by Hitachi or others in order to obtain a release from BPI of claims relating to the NCA and Hitachi's purchase of Power Systems, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, checks, wire transfer coupons, deposit slips, and agreements.
8. Any and all documents concerning the potential or actual purchase by Mitsui Babcock of BBX's subsidiary Power Service, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
9. Any and all documents concerning communications between BPI and Mitsui Babcock concerning the latter's purchase of Power Service, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
10. Any and all documents that support, refute, or otherwise concern the purchase by Balcke-Durr GmbH or BBP Service Rattingen GmbH f/k/a Balcke-Durr Service GmbH, including, but not limited to, e-mail communications, notes, memoranda, agreements, drafts, and correspondence.
11. Any documents concerning any actual or alleged breach of the NCA by BBP.
12. Any documents concerning any money actually or allegedly owed by BBP or BBX to BPI.

EXHIBIT K

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BABCOCK BORSIG POWER GmbH,
Plaintiff,

v.

BABCOCK POWER, INC.,
Defendant and Third-Party Plaintiff,

v.

BABCOCK BORSIG, AG
Third-Party Defendant.

C.A. No. 04 CV 10825-RWZ

NOTICE OF DEPOSITION

To: Steven J. Comen, Esq.
Goodwin Procter LLP
Exchange Place
Boston, MA 02109


Please take notice that beginning at 1:30 p.m. on January 26, 2006, at the offices of Lex Reporting Services Corporate Headquarters, 160 Broadway, New York, NY 10038, the Plaintiff Babcock Borsig Power GmbH will take the deposition of the Keeper of the Records, Hudson Investment Group, Inc., and that he is required to produce the documents set forth in the attachment hereto.

The deposition will be conducted before a Notary Public or other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

Respectfully submitted,

BABCOCK BORSIG POWER GMBH,

By Its Attorneys,


Kenneth M. Bello, BBO #036630
John F. Welsh, BBO #522640
Bello Black & Welsh LLP
535 Boylston Street, Suite 1102
Boston, Massachusetts 02116
(617) 247-4100

Dated: December 30, 2005

SUBPOENA: KEEPER OF THE RECORDS, HUDSON INVESTMENT GROUP, INC.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects:

1. Any and all e-mail communications from September 2002 through the Present relating to the November 13, 2002 Stock Purchase Agreement ("SPA") between Babcock Borsig Power, GmbH ("BBP") and Babcock Power Inc. ("BPI").
2. Any and all e-mail communications from September 2002 through the Present relating to the November 29, 2002 Non-Competition Agreement ("NCA") between BBP and BPI.
3. Any and all documents concerning the SPA, including, but not limited to drafts, notes, memos, and correspondence.
4. Any and all documents concerning the NCA, including, but not limited to drafts, notes, memos, and correspondence.
5. Any and all documents concerning the purchase by Babcock Hitachi K.K. or Hitachi Ltd. (collectively, "Hitachi") of Babcock Borsig AG's ("BBX") subsidiary Power Systems in December 2002, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
6. Any and all documents concerning communications between BPI and Hitachi concerning Hitachi's purchase of Power Systems, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
7. Any and all documents concerning monies pledged or paid by Hitachi or others in order to obtain a release from BPI of claims relating to the NCA and Hitachi's purchase of Power Systems, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, checks, wire transfer coupons, deposit slips, and agreements.
8. Any and all documents concerning the potential or actual purchase by Mitsui Babcock of BBX's subsidiary Power Service, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
9. Any and all documents concerning communications between BPI and Mitsui Babcock concerning the latter's purchase of Power Service, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
10. Any and all documents that support, refute, or otherwise concern the purchase by Balcke-Durr GmbH or BBP Service Rattingen GmbH f/k/a Balcke-Durr Service

GmbH, including, but not limited to, e-mail communications, notes, memoranda, agreements, drafts, and correspondence.

EXHIBIT L

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BABCOCK BORSIG POWER GmbH,
Plaintiff,

v.

BABCOCK POWER, INC.,
Defendant and Third-Party Plaintiff,

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BABCOCK BORSIG, AG
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Exchange Place
Boston, MA 02109

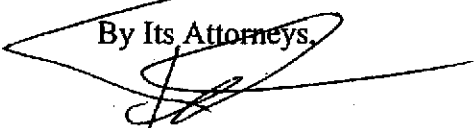
Please take notice that beginning at 2:00 p.m. on January 26, 2006, at the offices of Lex Reporting Services Corporate Headquarters, 160 Broadway, New York, NY 10038, the Plaintiff Babcock Borsig Power GmbH will take the deposition of the Keeper of the Records, Hudson Power Ventures I, LLP, and that he is required to produce the documents set forth in the attachment hereto.

The deposition will be conducted before a Notary Public or other officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

Respectfully submitted,

~~BABCOCK BORSIG POWER GMBH,~~

By Its Attorneys,


Kenneth M. Bello, BBO #036630
John F. Welsh, BBO #522640
Bello Black & Welsh LLP
335 Boylston Street, Suite 1102
Boston, Massachusetts 02116
(617) 247-4100

Dated: December 30, 2005

SUBPOENA: KEEPER OF THE RECORDS, HUDSON POWER VENTURES I, LLP.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects:

1. Any and all e-mail communications from September 2002 through the Present relating to the November 13, 2002 Stock Purchase Agreement ("SPA") between Babcock Borsig Power, GmbH ("BBP") and Babcock Power Inc. ("BPI").
2. Any and all e-mail communications from September 2002 through the Present relating to the November 29, 2002 Non-Competition Agreement ("NCA") between BBP and BPI.
3. Any and all documents concerning the SPA, including, but not limited to drafts, notes, memos, and correspondence.
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5. Any and all documents concerning the purchase by Babcock Hitachi K.K. or Hitachi Ltd. (collectively, "Hitachi") of Babcock Borsig AG's ("BBX") subsidiary Power Systems in December 2002, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
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9. Any and all documents concerning communications between BPI and Mitsui Babcock concerning the latter's purchase of Power Service, including, but not limited to e-mail communications, notes, memoranda, correspondence, drafts, and agreements.
10. Any and all documents that support, refute, or otherwise concern the purchase by Balcke-Durr GmbH or BBP Service Rattingen GmbH f/k/a Balcke-Durr Service

GmbH, including, but not limited to, e-mail communications, notes, memoranda, agreements, drafts, and correspondence.